

2. Pursuant to the July 15, 2016 Preliminary Approval Order, the NCAA requested that member institutions provide the Settlement Administrator with pertinent personal information of Settlement Class Members. The personal information provided by member institutions would be used to provide direct notice of the Settlement to Settlement Class Members.

3. As part of that request, the NCAA, through counsel, has requested that the Department of Defense, Department of the Army (United States Military Academy), Department of the Navy (United States Naval Academy), Department of Homeland Security (United States Coast Guard Academy) and Department of the Air Force (United States Air Force Academy) disclose the following information:

First name, last name, last known street address, city, state, zip code, e-mail address, telephone number, foreign province code, foreign postal code, and foreign country for the following individuals: All Persons who played an NCAA-sanctioned sport at the United States Military Academy, United States Naval Academy, United States Coast Guard Academy, and United States Air Force Academy, on or prior to July 15, 2016.

4. The United States has, in turn, taken the position that compliance with the NCAA's request would require disclosure of information otherwise protected by the Privacy Act, 5 U.S.C. § 552a.

5. Pursuant to 5 U.S.C. § 552a(b)(11), the proposed Order would authorize the United States to produce the requested personally-identifiable information, which the United States believes would otherwise be prohibited from disclosure under the Privacy Act.

6. The United States believes that release of the requested information under the proposed Privacy Act Protective Order would be to the benefit of the current and former student-athletes who are Settlement Class Members and, therefore, does not object to entry of this proposed Order.

7. On March 8, 2017, Plaintiffs' counsel represented to the NCAA's counsel that Plaintiffs do not oppose the relief sought in this Motion.

WHEREFORE, for the foregoing reasons and for good cause shown, the NCAA respectfully requests that the Court enter the attached Privacy Act Protective Order and grant such other relief as it may deem appropriate.

Dated: March 9, 2017

Respectfully submitted,

/s/ Johanna M. Spellman

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CERTIFICATE OF SERVICE

I, Johanna Spellman, certify that on March 9, 2017, a true and correct copy of the forgoing MOTION FOR ENTRY OF PRIVACY ACT PROTECTIVE ORDER PERMITTING DISCLOSURE OF FEDERAL RECORDS was filed through the CM/ECF system, which caused notice to be sent to all counsel of record.

/s/ Johanna M. Spellman

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EXHIBIT 1

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

)	MDL No. 2492
IN RE: NATIONAL COLLEGIATE)	
ATHLETIC ASSOCIATION STUDENT-)	Master Docket No. 1:13-cv-09116
ATHLETE CONCUSSION INJURY)	
LITIGATION)	Judge John Z. Lee
)	
)	Magistrate Judge M. David Weisman

[PROPOSED]
PRIVACY ACT PROTECTIVE ORDER

The above-described information shall be used solely for the purposes of providing direct notice of the Settlement to Settlement Class Members and not otherwise.

So Ordered.

Dated: _____, 2017

U.S. District Judge John Z. Lee